

**UNDER SEAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION

**FILED**  
CHARLOTTE, NC

FEB 18 2015

US DISTRICT COURT  
WESTERN DISTRICT OF N

UNITED STATES OF AMERICA,

DOCKET NO. 5:15-cr-15

vs.

**BILL OF INDICTMENT**  
**UNDER SEAL**

STEVEN W. CHASE

Defendant.

Violations:

18 U.S.C. § 2252A(g)

18 U.S.C. §§ 2251(d)(1) and (e)

18 U.S.C. § 2251(d)(1)

18 U.S.C. § 2252A(a)(1)

18 U.S.C. § 2252A(a)(5)(b)

**THE GRAND JURY CHARGES:**

**COUNT ONE**

Between on or about August 19, 2014 and February 17, 2015, in Caldwell  
County, within the Western District of North Carolina and elsewhere,

**STEVEN W. CHASE**

did knowingly engage in a child exploitation enterprise, that is, STEVEN W. CHASE  
violated Chapter 110 of Title 18 of the United States Code, as a part of a series of felony  
violations constituting three or more separate incidents and involving more than one  
minor victim, which offenses include those described in Counts Three through Seven of  
this Indictment, incorporated herein, and committed those offenses in concert with three  
or more other persons.

All in violation of Title 18, United States Code, Section 2252A(g).

**COUNT TWO**

Between on or about August 19, 2014 and February 17, 2015, in Caldwell County, within the Western District of North Carolina and elsewhere,

**STEVEN W. CHASE,**

did knowingly conspire to make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct; and participation in any act of sexually explicit conduct by and with any minor for the purpose of producing a visual depiction of such conduct; knowing and having reason to know that such notice and advertisement would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and such notice and advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(d)(1) and (e).

### **COUNT THREE**

Between on or about August 19, 2014 and February 17, 2015, in Caldwell County, within the Western District of North Carolina and elsewhere,

#### **STEVEN W. CHASE**

did knowingly make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct; and participation in any act of sexually explicit conduct by and with any minor for the purpose of producing a visual depiction of such conduct; knowing and having reason to know that such notice and advertisement would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and such notice and advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2251(d)(1).

**COUNT FOUR**

On or about February 1, 2015, in Caldwell County, within the Western District of North Carolina and elsewhere,

**STEVEN W. CHASE**

knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

All in violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT FIVE**

On or about October 12, 2014, in Caldwell County, within the Western District of North Carolina and elsewhere,

**STEVEN W. CHASE**

knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

All in violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT SIX**

On or about September 26, 2014, in Caldwell County, within the Western District of North Carolina and elsewhere,

**STEVEN W. CHASE**

knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

All in violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT SEVEN**

Between on or about August 19, 2014 and February 17, 2015, in Caldwell County, within the Western District of North Carolina and elsewhere,

**STEVEN W. CHASE**

knowingly possessed any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a minor who had not attained 12 years of age, and that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

## **NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of 18 U.S.C. § 2253. The following property is subject to forfeiture in accordance with Section 2253:

- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received as a result of the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).



The Grand Jury finds probable cause that the following property is subject to forfeiture on one or more of the grounds set forth above:

1. The real property at 3570 15<sup>th</sup> Avenue SW, Naples, Florida.

A TRUE BILL



ANNE M. TOMPKINS  
UNITED STATES ATTORNEY

  
CORTNEY RANDALL  
ASSISTANT UNITED STATES ATTORNEY

  
MICHAEL GRANT  
TRIAL ATTORNEY